Case 1:24-cv-04949-HB Document 65 Filed 06/03/25 Page 1 of 1 PageID: 1306

## **BLANKROME**

300 Carnegie Center | Suite 220 | Princeton, NJ 08540 A Pennsylvania LLP | Stephen M. Orlofsky, New Jersey Administrative Partner blankrome.com

Phone: (609) 750-7700

Fax: (609) 750-7701

June 3, 2025

## **VIA ELECTRONIC COURT FILING SYSTEM**

Honorable Harvey Bartle III, U.S.D.J. U. S. District Court for the Eastern District of Pennsylvania 16614 U.S. Courthouse 601 Market Street Philadelphia, PA 19106

Re: Atlas Data Privacy Corporation v. Belles Camp Comm. Inc., et al.,

Civil Docket No.: 1:24-cv-04949 HB

Joinder in Defendants' Consolidated Motions to Dismiss Plaintiffs' Complaint

## Dear Judge Bartle:

We represent the Defendant Belles Camp Communications, Inc. ("Defendant") in the above-referenced matter. We write to advise this Court that Defendant joins: in the Reply Brief in Further Support of Defendants' Consolidated Motion to Dismiss Pursuant to Rule 12(b)(6) that was filed in the action captioned as *Atlas Data Privacy Corporation*, et al. v. DM Group, Inc., Case No. 1:24-cv-04075-HB (D.N.J) (the "Consolidated Reply").

In addition, contemporaneous with the filing of this correspondence, Defendant is filing a Supplemental Brief in Support of its Reply in Support of Motions to Dismiss Plaintiffs' Complaint (the "Supplemental Brief"). For the reasons set forth in the Consolidated Reply and the Supplemental Brief, Defendant respectfully requests that this Court dismiss Plaintiffs' Complaint with prejudice.

Respectfully submitted,

## **BLANK ROME LLP**

/s/ Stephen M. Orlofsky STEPHEN M. ORLOFSKY

PHILIP N. YANNELLA THOMAS P. CIALINO

300 Carnegie Center, Suite 220

Princeton, NJ 08540

Stephen. Or lofsky @Blank Rome. com

Philip.Yannella@BlankRome.com

Thomas.Cialino@BlankRome.com

cc: All Counsel of Record (*via ECF*)